

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETER KRAVITZ, as Trustee of the Aegean
Litigation Trust,

Plaintiff,

-against-

E. NIKOLAS TAVLARIOS,
PETER C. GEORGIPOULOS,
JOHN P. TAVLARIOS, and
GEORGE KONOMOS,

Defendants.

Case No. 19 Civ. 8438

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DATE FILED: 11/4/19

STIPULATION AND ~~PROPOSED~~ ORDER

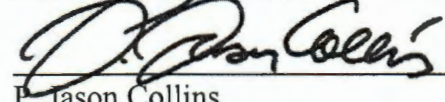
IT IS HEREBY STIPULATED AND AGREED among the parties that:

1. Defendants Peter C. Georgiopoulos, George Konomos, E. Nikolas Tavlarios, and John P. Tavlarios (together, "Defendants"), shall file letters requesting a pre-motion conference for a motion to dismiss, pursuant to Rule 2(B) of the Court's Individual Practices, on or before November 25, 2019;
2. The parties agree that pursuant to Rule 2(B) of the Court's Individual Practices, the deadline for Defendants to file any response to the Complaint is otherwise stayed until further order of the Court.
3. Counsel for E. Nikolas Tavlarios acknowledges that he has accepted service of the Summons and Complaint on behalf of his client;
4. Defendants waive any defense to the Complaint based on insufficient or defective service of process, but they otherwise reserve all rights and defenses; and
5. The parties agree to stay discovery pending resolution of Defendants' anticipated motions to dismiss.

Dated: November 1, 2019

Respectfully submitted,

REID COLLINS & TSAI LLP



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SHAPIRO ARATO BACH LLP

/s/ Jonathan Bach (with permission)

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Counsel to Defendant George Konomos

SO ORDERED this _____ day of _____, 2019

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/s/ Michael Tremonte (with permission)

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Counsel to Defendant John Tavlarios

HONORABLE NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: October 30, 2019

Respectfully submitted,

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Counsel to Defendant George Konomos

SO ORDERED this 4th day of November, 2019


HONORABLE NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE